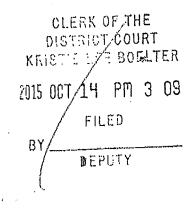
EXHIBIT A

Eric E. Holm
SATHER & HOLM, PLLC
2301 Montana Ave., Ste. 202
P.O. Box 1115
Billings, MT 59103
Phone: (406) 294-1700
Fax: (406) 794-0673
eric@satherandholm.com
Attorney for Plaintiff



## MONTANA THIRTEENTH JUDICIAL DISTRICT COURT, YELLOWSTONE COUNTY

ROXANNA JACKSON,	) Cause No.: DV 15-1350						
Plaintiff,	) Judge: GREGORY R. TODO						
<b>v.</b>	COMPLAINT AND DEMAND						
ST. VINCENT HEALTHCARE,	) FOR JURY TRIAL						
Defendant.	)						
,							

Plaintiff, by and through her counsel of record, Sather & Holm, PLLC, states and alleges as follows:

#### COMPLAINT

- 1. Plaintiff is an individual who, at all relevant times, resided in Billings, Yellowstone County, Montana. Plaintiff currently resides in Colorado.
- 2. Upon information and belief, Defendant is a Montana corporation doing business in Billings, Yellowstone County, Montana.
- 3. Plaintiff filed a charge of discrimination against Defendant with the Montana Human Rights Bureau and United States Equal Opportunity Commission. On

or about September 22, 2015, a Final Agency Decision was issued, granting Plaintiff the right to file suit against Defendant. As a result, Plaintiff has exhausted her administrative remedies.

- 4. Plaintiff was employed by Defendant in Billings, Yellowstone County, Montana, at all relevant times until August 27, 2014 when her employment was terminated.
  - 5. Plaintiff is a qualified individual with a physical or mental disability.
- 6. Defendant is a covered entity under the Americans with Disabilities Act and an employer subject to the Montana Human Rights Act.
- 7. Defendant intentionally discriminated against Plaintiff on the basis of her disability or disabilities, failed to accommodate Plaintiff's disability or disabilities, and retaliated against Plaintiff for her protected activity, all in violation of the Americans with Disabilities Act and the Montana Human Rights Act.
- 8. As a result of Defendant's actions, Plaintiff has suffered compensatory and other damages and is entitled to an award for all available damages, punitive damages, attorneys' fees, costs, and equitable relief.

#### WHEREFORE, Plaintiff requests relief as follows:

- 1. For judgment to be entered against Defendant and in Plaintiff's favor;
- 2. For those damages allowed by law for the injuries and losses to Plaintiff;
- 3. For punitive damages;
- For attorneys' fees and costs;
- 5. For equitable relief; and
- 6. For such other relief as the Court may deem just and proper.

### DEMAND FOR JURY TRIAL

Plaintiff demands a jury trial on all issues so triable.

DATED this 14th day of October, 2015.

SATHER AND HOLM, PLLC

By:

Eric E. Holm

Attorney for Plaintiff

Eric E. Holm SATHER & HOLM, PLLC 2301 Montana Ave., Ste. 202 P.O. Box 1115 Billings, MT 59103 Phone: (406) 294-1700

Phone: (406) 294-1700 Fax: (406) 794-0673 eric@satherandholm.com Attorney for Plaintiff



# MONTANA THIRTEENTH JUDICIAL DISTRICT COURT, YELLOWSTONE COUNTY

ROXANNA JACKSON,	) Cause No.:	DΥ	1	5	www.	1	3	5	0
Plaintiff,	) Judge:	GREGORY	/ R.	TC	QC	)			
v.	SUMMONS								
ST. VINCENT HEALTHCARE,									
Defendant.	)								
	) )								

To: ST. VINCENT HEALTHCARE:

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (or 42 days if you are the State of Montana, a state agency, or a state officer or employee), you must serve on the plaintiffs an answer to the attached complaint or a motion under Rule 12 of the Montana Rules of Civil Procedure. Do not include the day you were served in your calculation of time. The answer or motion must be served on the plaintiff or plaintiff's attorney, if plaintiff is represented by an attorney, whose name and address is listed above.

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint.

You must file your answer or motion with the court.

# Case 1:15-cv-00115-SPW Document 1-1 Filed 11/10/15 Page 6 of 6

Date: _	October 14, 2015
	Kristie Lee Boelter: Clerk of the District Court
(Seal)	By: And January
, .	Deputy Clerk